

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND**

SOLUTIONS IN HOMETOWN
CONNECTIONS, ET AL.,

Plaintiffs,

v.

KRISTI NOEM, SECRETARY OF THE
DEPARTMENT OF HOMELAND
SECURITY, ET AL.,

Defendants.

Case No.: 8:25-cv-00885-LKG

**CONSENT MOTION FOR EXTENSION OF TIME
TO RESPOND TO PLAINTIFFS' AMENDED COMPLAINT**

Defendants, by and through undersigned counsel, with the consent of Plaintiffs, hereby move for an extension of time to respond to the First Amended Complaint for Declaratory and Injunctive Relief and Vacatur of Final Agency Action, ECF No. 52 (the “Amended Complaint”), and in support thereof state as follows:

1. On March 17, 2025, Plaintiffs filed their Complaint for Declaratory and Injunctive Relief and Vacatur of Final Agency Action, ECF No. 1. On April 25, 2025, Plaintiffs filed the Amended Complaint, ECF No. 52.

2. The office of undersigned counsel was served on March 21, 2025, making May 20, 2025 the current deadline for Defendants to respond to the Amended Complaint.

3. On April 25, 2025, Plaintiffs filed a Motion for Preliminary Injunction & APA § 705 Stay, ECF No. 53 (the “PI Motion”).

4. A hearing on the PI Motion is currently scheduled for May 20, 2025 (ECF No. 59), which is the same date that Defendants’ response to the Amended Complaint is due.

5. Among other things, the Court's decision on the PI Motion may help to clarify issues for the parties in moving forward on this case. Defendants, therefore, seek an extension of time to respond to the Amended Complaint tied to the date that this Court issues an opinion on the PI Motion. Plaintiffs consent.

6. Counsel for the parties have conferred and agreed to the following briefing schedule.¹ Defendants will respond to the Amended Complaint within 30 days of this Court's issuance of an opinion on the PI Motion; Plaintiffs' opposition brief will be due 30 days thereafter; and Defendants' reply brief will be due 21 days thereafter.

7. Defendants recognize that the Case Management Order entered in this case, ECF No. 21, requires a party to file a Notice of Intent to File a Motion (a "Notice") with the Court prior to filing a motion to dismiss. Given the Court's familiarity with the issues in this case from Plaintiffs' first motion for preliminary injunction, ECF No. 30, and this Court's opinion thereon, ECF No. 46, as well as from the pending PI Motion, Defendants respectfully ask that either a Notice not be required or that the Court consider this motion to constitute such Notice.

WHEREFORE, based on the foregoing, Defendants, with Plaintiffs' consent, respectfully request that the Court grant this *Consent Motion for Extension of Time to Respond to Plaintiffs' Amended Complaint* and enter the attached proposed order.

¹ Defendants anticipate filing a motion to dismiss the Amended Complaint on the response deadline, but reserve the right to otherwise respond to the Amended Complaint.

Dated: May 8, 2025

Respectfully submitted,

Kelly O. Hayes
United States Attorney

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